EXHIBIT A

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Attorneys for Plaintiff Croda Unigema, Inc.

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

CRODA UNIQEMA, INC., formerly known as ICI UNIQEMA INC.

: HONORABLE JOEL A. PISANO, U.S.D.J. : C. A. No. 06-02943 (JAP) (TJB)

Plaintiff.

٧,

JOINT PROPOSED **SCHEDULING ORDER**

KOBO PRODUCTS, INC.,

Defendant-

Counterclaim Plaintiff,

٧.

ICI UNIQEMA, INC., and IMPERIAL CHEMICAL INDUSTRIES, PLD,

Counterclaim Defendant.

Conference Date:

Plaintiff Croda Uniqema Inc. ("Uniqema"), formerly known as ICI Uniqema Inc., and Defendant Kobo Products, Inc. ("Kobo") have conferred and agreed upon the following pretrial schedule and procedures.

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1. Discovery Limitations

(a) The parties agree that each shall be limited to 20 depositions (exclusive of expert depositions), each deposition not to exceed 7 hours or one day pursuant to Rule 30(a)(2)(A) and 30(d)(2) of the Federal Rules of Civil Procedure. The parties agree that they will consent to reasonable requests for additional depositions and, if necessary, jointly seek the consent of the Court.

2. Proposed Schedule

(c)

The parties agree that the case schedule should proceed as follows:

- (a) Motions to amend pleadings to add parties or claims shall be due December 15, 2009.
- (b) The close of fact discovery shall be on March 2, 2010.

Service of opening expert reports on issues for which a party bears the burden of proof shall be on March 30, 2010.

- (d) Service of rebuttal expert reports shall be on April 27, 2010.
- (e) The close of expert discovery and expert depositions shall be on May 25, 2010.
- (f) Service of opening briefs on dispositive motions shall be on June 15, 2010.
- (g) Service of opposition briefs on dispositive motions shall be due on July 7, 2010.
- (h) Service of reply briefs on dispositive motions shall be due on July 21, 2010.
- (i) Exchange of Rule 26(a)(3) Pretrial Disclosures shall be due six weeks prior to the Pretrial Conference date in section (k) below.
- Objections to Rule 26(a)(3) Pretrial Disclosures shall be due three weeks prior to the Pretrial Conference date in section (k) below.

(k) Final Pretrial Conference on Syst 8, Jose filled in by the Court].

(1) Trial will be held on ______ date [to be filled in by the Court].

Selephore status conference to be intrated by Plantiff: December 2 2009 at 10 AM.

Resp	ectfully submitted:	
Ву	Dennis R. LaFiura David S. Sager Paul R. Marino DAY PITNEY P.O. Box 1945 Morristown, NJ 07962-1945 Telephone: (973) 966-6300 Facsimile: (973) 966-1015	Peter A. Sullivan Eric Blumenfeld HUGHES HUBBARD & REED LLP 101 Hudson Street, Suite 3601 Jersey City, NJ 07302-3910 Telephone: (201) 536-9220 Facsimile: (201) 536-0799 Attorneys for Defendant, Kobo Products, Inc.
	R. Eric Hutz. CONNOLLY BOVE LODGE & HUTZ LLP The Nemours Building 1007 North Orange Street P.O. Box 2207 Wilmington, DE 19899 Telephone: (302) 888-6230 Facsimile: (302) 658-5614	
	Attorneys for Plaintiff, Croda Uniqema, Inc.	So Ordered this 22 day

DATED: August 26, 2009

ORDER ON ORAL MOTION